



U.S. Department of Justice

United States District Court
Southern District of New York

86 Chambers Street
New York, New York 10007

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April 4, 2022

BY ECF

Hon. Victor Marrero, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Jones et al. v. United States Postal Service et al.*, No. 20 Civ. 6516 (VM)

Dear Judge Marrero:

This Office represents the defendants in the above-referenced case. We write jointly on behalf of all parties respectfully to request a further adjournment of the deadline for Plaintiffs to file an application, if they choose to do so, for fees under the Equal Access to Justice Act. The deadline is currently April 8, 2022. (ECF No. 140). The parties seek an adjournment until May 20, 2022, to allow them additional time to discuss the issue of fees and whether litigation will be required. The defendants have conducted additional consultations since the parties' last update to the Court with respect to Plaintiffs' demand, but these consultations were unfortunately substantially delayed by, principally, an extended leave taken by the undersigned due to the loss of an immediate family member. The parties continue to communicate, and the defendants are endeavoring to complete their internal consultation so that the issue of fees can be presented to the Court, whether as a resolved or as a still-disputed matter.

The parties thank the Court for its consideration of this joint request.

Respectfully,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York
Attorney for Defendants

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Request GRANTED.

The deadline for application of fees is extended to May 20, 2022. The parties shall provide an update to the Court by that date.

SO ORDERED.

4/5/2022

DATE


VICTOR MARRERO, U.S.D.J.